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SBC

December 19, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Ex Parte

RE: *Application by SBC Communications Inc. for Authorization Under Section 271 of the Communications Act to Provide In-Region Interlata Service in the States of Kansas and Oklahoma. Docket No. 00-217*

Dear Ms. Salas:

During a previously documented ex parte meeting on December 13, 2000 with John Stanley and Trent Harkrader , discussing Performance Measure 123 (Percent of Timely and Compliant Change Management Notices) for October, 2000, Commission Staff requested SWBT provide additional information about SWBT's performance.

Specifically, staff requested that SWBT explain what caused the Change Management notifications (Accessible Letters) sent and measured in October to be late, whether or not CLECs were negatively impacted because of these notifications, and how "versioning" relates to the Change Management notification process.

Enclosed please find the response to Commission Staff's request.

Pursuant to Section 1,1206(a)(l) of the Commission' s rules, an original and one copy of this letter are being submitted to the Office of the Secretary.

Sincerely,

Jan Price
Associate Director – Federal Regulatory
202-326-8837

cc: John Stanley

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This responds to a request from Commission Staff for an explanation of SWBT's October results on PM 123: Percent of Timely and Compliant Change Management Notices.

October is the second month in which SWBT has reported results on the new PM 123, which measures the percent of timely and compliant change management notices in a given month for EDI (pre-ordering), CORBA, DataGate, Verigate, EDI (ordering), LEX, Order Status, Provisioning Order Status, Trouble Administration, EASE, and SORD.[1] This is a "diagnostic" measurement, implemented at the CLECs request with Version 1.7 of the Business Rules.

SWBT's reported results for October show that a total of 8 change management notices were sent, 4 of which were "on time," for an overall 50% performance rate.[2] Of these eight, one was a duplicate, which was reissued at the CLECs' request in a lower version of WORD.[3] Another letter related to changes in the release requirements that were mandated by an arbitration award, and therefore should have been excluded from the measurement according to the Business Rules.[4] With these adjustments, PM 123 should actually have reported 6 notices with 3 notices "on time."

The three "late" Accessible Letters were sent to notify, correct, or update Final Requirements for a new release. Below is a summary of the "late" Accessible Letters reported for PM 123 in October 2000:

- **CLECSS00-182** - dated October 2, 2000. Final Requirements for Consumer EASE ("CEASE") for October 7, 2000 release.[5] Notice was sent late due to a change in personnel in the CEASE development group, who were not made aware of the need to provide notification to wholesale customers of upcoming CEASE changes. The SWBT application manager, who is responsible for managing this interface for wholesale customers, has notified all internal SWBT EASE personnel to ensure the new team has a thorough understanding of change management requirements. The timeliness of this notification had no negative impact on CLEC users as CLECs were notified of Initial Requirements on September 22, 2000.[6] No CLEC provided comments or questions on

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[1] Under the CMP guidelines, SWBT is required to provide Final Requirements for application-to-application interfaces (referred to as "Category 1," including EDI ordering and pre-order; CORBA and DataGate) 120 days prior to implementation, and for GUI interfaces ("Category 2," including LEX, Verigate, EASE, SORD, Order Status, Provisioning Order Status, and Trouble Administration) 14 days prior to implementation. See, Ham Aff, Attachment G, SWBT/CLEC Interface Change Management Process ("CMP"), Sections 3.3.11 and 3.5.5.

[2] Timely and complete documentation provided to the CLECs for requirements associated with releases are a part of this measurement. Regulatory mandates, emergency fixes, CLEC-initiated changes (which do NOT include changes requested due to a mistake by SWBT and identified by a CLEC), and SWBT-initiated enhancements or changes to requirements for which SWBT requests that PM 123 does not apply and CLECs agree are excluded from this measurement.

[3] CLECSS00-185 was reissued in a lower version of WORD as CLECSS00-188.

[4] CLECSS 00-183.

[5] CEASE is SWBT's retail system, which is available for CLECs ordering residential resale service.

the Initial Requirements to its Account Manager, and the Initial Requirements had not been changed or updated. Furthermore, CEASE is a Category 2 interface and requires no CLEC programming or system changes.

- **CLECSS00-185** – dated October 4, 2000. This letter provided revisions to the Final Requirements for EDI/CORBA pre-order December 9, 2000 release 2.4.0. A high-level summary of the changes/updates include:
    - Change pre-ordering field length to be consistent with ordering field length.
    - Documentation was clarified on two fields in response to a Pacific CLEC's request.
    - Additional enhancements to include certain Verigate functionality in EDI/CORBA in response to a Pacific CLEC's change request.

- **CLECSS00-196** – dated October 26, 2000. Update to Exception Request Final Requirements for December 9, 2000 EDI/LSR Release. The modifications detailed in this letter were primarily made to clarify SWBT's documentation on edits and fields. A high-level summary of other specific changes/updates include:
    - Modification of ERROR LS1340, based on CLEC request to further clarify an existing error message.
    - Enhancement to return multiple order numbers on FOC and SOC. CLECs had requested this information in the past. When SWBT determined it would be able to complete its programming, SWBT made this information available to the CLECs in the December 9, 2000 EDI/LSR release

Two of the above letters (CLECSS00-185 and 00-196) are exception requests. As defined in change management, an "exception request" is any request for a change in release requirements that is made after the Final Requirements are issued.[7] These two letters included relatively minor exception requests made by both SWBT[8] and the CLECs.[9] Under CMP guidelines, all exception

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[6] CLECs were notified of the Initial Requirements for the October 7, 2000 CEASE releases via Accessible Letter, CLECSS00-173, dated September 22, 2000, which called for CLEC comments and questions by September 29, 2000. As no CLEC provided comments or questions to its Account Manager, the Initial Requirements were unchanged and thus became the Final Requirements issued in the Accessible Letter in question.

[7] See, CMP, Section 6.2.

[8] SWBT issues exception requests to correct problems discovered during SWBT's internal testing and to ensure successful release implementation. SWBT's OSS software releases have become increasingly complex in nature and SWBT's thorough testing program is designed specifically to ensure successful releases by discovering problems prior to implementation. Because the deadline for Final Requirements for application-to-application interfaces is so far in advance of the release implementation (120 days or approximately *four months* before release implementation), updates to the release documentation often prove necessary as testing continues. Although SWBT has agreed for purposes of PM 123 that any exception request sent after the Final Requirements are issued technically counts against SWBT as "late," SWBT does not believe the designation is appropriate for the various reasons discussed in this letter.

[9] CLECs may request SWBT to clarify the documentation published in the Final Requirements. For example, one or two CLECs may desire further clarification of a particular field even though the majority of the CLECs do not consider the documentation on this field an issue. In an effort to respond to these CLEC requests, SWBT will issue another Accessible Letter to clarify its documentation by updating the Final Requirements. SWBT's overriding goal

requests must have unanimous approval by impacted qualified CLECs. If any CLEC notifies SWBT during the comment window that it cannot agree to the exception request proposed by SWBT or another CLEC, SWBT must either delay the release in order to give the CLEC the time it needs to make the applicable coding changes, or withdraw its exception request.[10] It is important to note that there was no CLEC objection to the exception requests noted above and, in fact, no CLEC has ever proposed that a release be delayed because of its inability to complete coding for any exception requests.

At the time PM 123 was negotiated, SWBT did not yet support versioning on its application-to-application interfaces (with the exception of DataGate).[11] Because CLECs were required to "flash cut" to the latest EDI/LSR release, timely notification of changes was deemed critical in order to permit a CLEC adequate time to make its own system coding changes. Similarly, at the time that performance measures for change management were adopted by Bell Atlantic (now Verizon), versioning had not yet been implemented for New York CLECs. Enacting performance measures for timely change management notification attempted to ensure that BOCs remained considerate of CLECs' change management needs.

However, with the implementation of versioning, SWBT currently supports the two most current EDI versions at any one time. With this capability, a CLEC no longer must code its interfaces in a "flash cut" mode – rather, a CLEC has the option of moving to the new release at its own pace. Thus, SWBT-initiated exception requests have much less impact on a CLEC today than during the pre-versioning era. A CLEC that cannot accommodate the proposed "exception" changes now can either request a delay in the release requirements as discussed above, or can wait to move to the new version until it has completed its necessary coding changes.[12]

In summary, while two "exception" request letters were sent "late" according to the PM 123 Business Rules, the subject letters improved the quality of the releases with no adverse impact to the CLECs. No CLEC complained about these letters at any CMP meeting, or in comments to the FCC in connection with SBC's Kansas/Oklahoma 271 Application. No CLEC requested a delay in implementation, and all CLECs seem to find SWBT's versioning a useful tool for extending the time required for programming to a new release.

Given the option of strict compliance with final notification deadlines or "late" changes/updates to correct problems or clarify documentation to ensure a quality release, the choice is evident – especially with the mechanisms built into the process to ensure no adverse impact to CLECs from the issuance of exception requests. Finally, while SWBT regrets that the Final

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is to ensure a quality release. Although letters issued solely in response to a CLEC request for clarification do not count against SWBT for purposes of PM 123, letters that include changes requested by both CLECs and SWBT count as "late."

[10] . Evidence of this type of occurrence was presented in SWBT's Texas 271 application when an Accessible Letter (CLECSS00-071), dated March 23, 2000, indicated that a particular edit was removed from the May 27, 2000 EDI/LSR release due to CLEC objections. See, Ham Supplemental Aff. ¶ 58.

[11] Versioning for EDI became effective with the August 12, 2000 EDI/LSR release. See Ham Aff. ¶¶ 71-74.

[12] Notably, no CLEC moved to the December 9, 2000 EDI/LSR release upon implementation – all CLECs appear to be taking full advantage of versioning.

Requirements letter for CEASE referenced above was not sent on a timely basis, SWBT notes that no programming changes by the CLECs were necessary to accommodate this release. As noted above, SWBT has undertaken to ensure timely issuance of CEASE requirements in the future.